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Attorneys for Patricia Connor,
on behalf of herself and all others similarly situated

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**PATRICIA CONNOR,
INDIVIDUALLY AND ON BEHALF
OF ALL OTHERS SIMILARLY
SITUATED**

PLAINTIFFS,

V.

**JPMORGAN CHASE BANK AND
FEDERAL NATIONAL MORTGAGE
ASSOCIATION A/K/A FANNIE MAE,**

DEFENDANTS.

Case No.: 10-cv-1284 GPC (BGS)

CLASS ACTION

**DECLARATION OF PATRICIA
CONNOR IN SUPPORT OF JOINT
MOTION FOR FINAL APPROVAL
OF CLASS ACTION
SETTLEMENT AND ATTORNEYS
FEES**

Date: December 4, 2014

Time: 1:30 p.m.

Courtroom: 2D

THE HON. GONZALO P. CURIEL

- 1 1. I, Patricia Connor, am one of the named Plaintiffs in this action. I submit this
2 declaration in support of the Joint Motion for Final Approval of the Class
3 Action Settlement. If called as a witness, I would competently testify to the
4 matters herein from personal knowledge.
- 5 2. Before the filing of this Complaint, I met with my attorneys for an initial
6 consultation regarding Defendants' alleged wrongful actions. Throughout the
7 litigation of this case, I participated in the negotiations of this case in the
8 following ways: I made myself available at short notice to answer questions
9 and assist my attorneys; I had numerous conversations with my attorneys in
10 describing the events and the facts of this case, and answering any other
11 questions that they had; I have read numerous documents including but not
12 limited to the complaint, MOU, Settlement Agreement, preliminary approval
13 papers and the Amendment to the Settlement Agreement; and, I have been
14 "on call" twice for a mediation before the Honorable Edward A. Infante in
15 San Diego. To do this, I spent several hours with my attorney in preparation
16 of the ENE, cleared a complete day in my schedule in case my attorney
17 needed to contact me on the date of the mediation, and assisted with the
18 mediation process. I have also gone to a mediation
- 19 3. I have reviewed and discussed with my attorneys the terms of the Settlement
20 Agreement and Amendment to the Settlement Agreement. I fully understand
21 the terms in both these documents. I support the final approval of this
22 settlement and believe the settlement is fair and reasonable.
- 23 4. I understand that prior to the hearing date on the Motion for Final Approval,
24 Defendants identified a portion of the Settlement Class that inadvertently was
25 not provided notice. As a result, the Parties agreed to continue the hearing on
26 the Motion for Final Approval in order to allow Defendants to identify the
27 entire population. I understand that Defendants have identified an additional
28

1 1,498,593 Settlement Class Members (“Group Two”), of which 1,303,112 are
2 potentially entitled to make a claim.

3 5 It is my understanding that there are less than ten objections filed for group 1
4 and group 2 combined and class counsel will specifically address those
5 objections once the deadline for objections has passed. As a result, I feel that
6 is strong indication of the merits of the settlement, which is more reason for
7 granting the final approval.

8 6. I understand that my attorneys will move the Court for an incentive payment
9 of \$5,000 total to be paid from the Settlement Fund to the class
10 representatives, which includes myself and Plaintiff Sheri L. Bywater. I
11 understand that any such award will have to be approved by the Court.

12 7. I further understand that my attorneys will also move the Court for an award
13 of attorneys’ fees and costs to be paid from the Settlement Fund. The amount
14 paid for the attorneys’ fees and costs shall be: 1) \$2,250,000 (taken out of the
15 common fund) for work done under the original settlement agreement for
16 Group One; 2) \$125,000 (paid directly by Defendants) for work done under
17 the amended settlement agreement for Group Two and; 3) Costs of
18 \$23,878.58 associated with Group 1 settlement (taken out of the common
19 fund). It is my understanding that Defendants will not object to a request by
20 Class Counsel for attorneys’ fees and costs as described above. However, I
21 understand that any such award will have to be approved by the Court.

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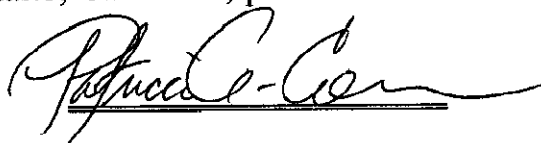
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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on September 30, 2014 at Rialto, California, pursuant to the laws
3 of the United States.



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5 Patricia Connor

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